

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

DEC 07 2017

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

LUIS DE JESUS RODRIGUEZ aka
HTOWN HUNTER,
HELEN LEON MESA, and
ALEXANDER VICTORIA ISAAC

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CRIMINAL NO. 17-CR-

UNDER SEAL

17 CR 724

INDICTMENT

The United States Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. Defendant Luis De Jesus Rodriguez, also known as Htown Hunter (“RODRIGUEZ”), is a resident of the United States.
2. Defendant Helen Leon Mesa (“MESA”) was the girlfriend of Defendant RODRIGUEZ, and is a resident of the United States.
3. Defendants RODRIGUEZ and MESA ran a sex trafficking conspiracy that targeted and recruited young women in Colombia and within the United States to enter into debt bondage contracts. Defendants RODRIGUEZ and MESA used these debt bondage contracts and other means to force, threaten, defraud, and coerce the young women into engaging in commercial sex acts.
4. Defendant Alexander Victoria Isaac (“ISAAC”) is a Colombian resident and national.

5. Defendant ISAAC recruited women in Colombia who eventually became victims of the sex trafficking conspiracy and helped them obtain visas to enter into the United States under false pretenses.

6. Victim A, Victim B, and Victim D were adult Colombian females whom Defendants RODRIGUEZ and MESA forced, threatened, defrauded, and coerced into engaging in commercial sex acts in Houston, Texas.

7. Victim C was an adult Cuban female residing in the United States whom Defendants RODRIGUEZ and MESA forced, threatened, defrauded, and coerced into engaging in commercial sex acts in Houston, Texas.

8. Since August 2016, Defendants RODRIGUEZ, MESA, ISAAC and other co-conspirators recruited victims with promises of earning a great amount of money and a better life in the United States.

9. The victims were shown photographs and videos portraying Defendant RODRIGUEZ as a bounty hunter. The victims were given the impression that Defendant RODRIGUEZ was a police officer and had connections with law enforcement in the United States.

10. To bring these victims into the United States, the defendants engaged in widespread visa fraud. For example, the defendants created false backgrounds for the victims, including fictitious occupations. The defendants coached the victims as to what to say during their visa interviews at the U.S. Embassy so as to avoid detection and ultimately receive a visa from the United States. The defendants also completed visa documents for the victims which contained a variety of false statements, including that the victims did not intend to work in the United States.

11. Once the victims arrived in Houston, Texas, they discovered that they had been brought to the United States under false pretenses. The victims were coerced into signing debt

bondage contracts in which they owed a significant debt to Defendant RODRIGUEZ—ranging from \$13,200 USD to \$25,000 USD, with a daily payment ranging from \$200 USD to \$250 USD. These contracts fraudulently promised the victims that they would be provided with work permits, legal documentation, and medical care, among other items. To keep the victims further in debt, the debt bondage contract provided for monetary fines if the victim engaged in romantic relationships, “outings away from the Establishment” without the Defendants RODRIGUEZ and MESA’s consent, and for taking a scheduled workday off.

12. Defendants RODRIGUEZ and MESA also recruited vulnerable victims within the United States to work for the conspiracy and subjected them to a similar debt bondage scheme.

13. Defendants RODRIGUEZ and MESA further controlled the victims by living with them in the same house and provided cellular phones to the victims in order to track their locations. The victims were required to frequently report their locations to Defendants RODRIGUEZ and MESA.

14. Defendant MESA facilitated the victims’ employment at a strip club in Houston, Texas, in order for the victims to pay off their debt. In order to pay the daily \$250 USD quota, Defendants RODRIGUEZ and MESA forced, threatened, defrauded and coerced the victims into engaging in commercial sex acts.

15. When a victim became non-compliant or tried to leave without paying a full debt, Defendants RODRIGUEZ and MESA threatened the victim and her family to compel the victim to continue working.

COUNT ONE
Sex Trafficking Conspiracy
18 U.S.C. §§ 1594(c), 1591(a)

The allegations in Paragraphs 1 through 15 of this Indictment are realleged and

incorporated as if fully set forth herein.

Beginning on or about August 2016, and continuing until on or about December 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

defendants herein, conspired with one or more persons to knowingly, recruit, entice, harbor, transport, provide, obtain, and maintain by any means in and affecting interstate and foreign commerce, and to knowingly benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited, in and affecting interstate and foreign commerce, Victim A, Victim B, Victim C, and Victim D, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause Victim A, Victim B, Victim C, and Victim D to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1594(c) and 1591(a).

COUNT TWO

**Sex Trafficking by Means of Force, Fraud, or Coercion -Victim A
18 U.S.C. §§ 1591(a) and 2**

The allegations set forth in Paragraphs 1 through 15 are realleged and incorporated as if fully set out herein.

Beginning in or about August 2016, and continuing until on or about December 15, 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

defendants herein, knowingly, in and affecting interstate and foreign commerce recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited Victim

A, knowing and in reckless disregard of the fact that means force, threats of force, fraud and coercion would be used to cause Victim A to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT THREE
Sex Trafficking Means of Force, Fraud, or Coercion -Victim B
18 U.S.C. §§ 1591(a) and 2

The allegations set forth in Paragraphs 1 through 15 are realleged and incorporated as if fully set out herein.

Beginning in or about September 2016, and continuing until on or about December 15, 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

defendants herein, knowingly, in and affecting interstate and foreign commerce recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited Victim B, knowing and in reckless disregard of the fact that means force, threats of force, fraud and coercion would be used to cause Victim B to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT FOUR
Sex Trafficking by Means of Force, Fraud, or Coercion -Victim C
18 U.S.C. §§ 1591(a) and 2

The allegations as set forth in Paragraphs 1 through 15, are realleged and incorporated as if fully set out herein.

Beginning in or about October 2016, and continuing until on or about December 15, 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

defendants herein, knowingly, in and affecting interstate and foreign commerce recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited Victim C, knowing and in reckless disregard of the fact that means force, threats of force, fraud and coercion would be used to cause Victim C to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT FIVE
Sex Trafficking by Means of Force, Fraud, or Coercion -Victim D
18 U.S.C. §§ 1591(a) and 2

The allegations as set forth in Paragraphs 1 through 15 are realleged and incorporated as if fully set out herein.

Beginning in or about August 2016, and continuing until on or about December 15, 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

defendants herein, knowingly, in and affecting interstate and foreign commerce recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited Victim D, knowing and in reckless disregard of the fact that means force, threats of force, fraud and coercion would be used to cause Victim D to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT SIX
Conspiracy to Commit Visa Fraud
18 U.S.C. § 371

The allegations set forth in Paragraphs 1 through 15 are realleged and incorporated as if fully set out herein.

Beginning in or about August 2016, and continuing until in or about December 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER,
HELEN LEON MESA, and
ALEXANDER VICTORIA ISAAC,**

defendants, herein, conspired with one or more persons known and unknown to the Grand Jury to commit an offense against the United States and to defraud the United States, and one or more did an act to effect the object of the conspiracy, that is, did knowingly and willfully aid, abet, counsel, command, induce, and procure another person to utter, use, attempt to use, possess, obtain, accept, and receive an immigrant visa, namely a tourist visa, for entry into the United States and as evidence of authorized stay and employment in the United States, knowing that the tourist visa had been procured by means of false claims and statements, and to have been otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

THE PURPOSE OF THE CONSPIRACY

16. The members of the conspiracy facilitated the international transportation of the victims by engaging in widespread visa fraud for financial gain.

17. Members of the conspiracy assisted victims in obtaining fraudulent visas through the use of false statements. Defendants and conspirators known and unknown to the Grand Jury completed visa documents for the victims which included a multitude of false statements, including that the victims did not intend to work in the United States. The Defendants created false backgrounds for the victims, including fictitious occupations, and coached the victims as to what to say during their visa interviews so as to avoid detection and ultimately receive a visa. Defendants ISAAC, RODRIGUEZ, and MESA all knew that the victims would be working for Defendants RODRIGUEZ and MESA in the United States.

OVERT ACTS

18. On or about August 7, 2016, a co-conspirator completed and submitted a fraudulent visa application for Victim A, which falsely stated that she was traveling to the United States for a vacation with her boyfriend, Defendant ISAAC. Victim A was instructed falsely state that she worked at a training center for transporters of hazardous material.

19. In early to mid August 2016, Defendant ISAAC facilitated the receipt of Victim A's visa. Defendant ISAAC also took Victim A for her fingerprinting and visa interview to the US Embassy in Bogota, Colombia.

20. In early October 2016, a co-conspirator completed and submitted a fraudulent visa application for Victim D, which falsely stated that she was traveling to the United States for a vacation with her fiancé. Victim D was instructed to falsely state that she worked at a business where she was a logistics supervisor.

21. In early October 2016, Defendant ISAAC facilitated the receipt of Victim D's visa. Defendant ISAAC also took Victim D for her fingerprinting and visa interview to the US Embassy in Bogota, Colombia.

22. Defendants RODRIGUEZ and MESA financially facilitated obtaining the fraudulent visas for Victims A and D, by sending money to Defendant ISAAC and other co-conspirators in Colombia.

In violation of Title 18, United States Code, Section 371.

COUNT SEVEN
Visa Fraud – Victim A
18 U.S.C. §§ 1546 and 2

The allegations set forth in Paragraphs 1 through 22 are realleged and incorporated as if fully set out herein.

Beginning in or about August 2016, and continuing until on or about December 15, 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER,
HELEN LEON MESA, and
ALEXANDER VICTORIA ISAAC,**

defendants herein, aiding and abetting one another, did knowingly and willfully aid, abet, counsel, command, induce, and procure another person to utter, use, attempt to use, possess, obtain, accept, and receive an immigrant visa, namely a tourist visa, for entry into the United States and as evidence of authorized stay and employment in the United States, knowing that the tourist visa had been procured by means of false claims and statements, and to have been otherwise procured by fraud and unlawfully obtained for Victim A, to wit, false representations were made regarding Victim A's occupation and purpose of her trip.

**COUNT EIGHT
Visa Fraud-Victim D
18 U.S.C. §§ 146 and 2**

The allegations as set forth in Paragraphs 1 through 22 are realleged and incorporated as fully set out herein.

Beginning in or about October 2016, and continuing until on or about December 2016, in the Houston Division of the Southern District of Texas and elsewhere,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER,
HELEN LEON MESA, and
ALEXANDER VICTORIA ISAAC,**

defendants herein, aiding and abetting one another, did knowingly and willfully aid, abet, counsel, command, induce, and procure another person to utter, use, attempt to use, possess, obtain, accept, and receive an immigrant visa, namely a tourist visa, for entry into the United States and as evidence of authorized stay and employment in the United States, knowing that the tourist visa

had been procured by means of false claims and statements, and to have been otherwise procured by fraud and unlawfully obtained for Victim D, to wit, false representations were made regarding Victim D's occupation and purpose of her trip.

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

23. Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER, and
HELEN LEON MESA,**

that upon conviction of any of Counts 1 through 5, the United States intends to seek forfeiture of:

- (A) all property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and
- (B) all property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(6)(A)(ii)(I))

24. Pursuant to Title 18, United States Code, Section 982(a)(6)(A)(ii)(I), the United States gives notice to defendants,

**LUIS DE JESUS RODRIGUEZ aka HTOWN HUNTER,
HELEN LEON MESA, and
ALEXANDER VICTORIA ISAAC,**

that upon conviction of any of Counts 6 through 8, the United States intends to seek forfeiture of:

- (A) all property, real or personal, that constitutes, or is derived from or is

traceable to the proceeds obtained, directly or indirectly, from the commission of the offense; and

- (B) all property, real or personal, that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

MONEY JUDGMENT AND SUBSTITUTE ASSETS

The United States may seek the imposition of a money judgment against each Defendant. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the Defendants up to the total value of the property subject to forfeiture.

TRUE BILL:

ORIGINAL SIGNATURE ON FILE

~~FOREPERSON~~ OF THE GRAND JURY

ABE MARTINEZ
Acting United States Attorney

By: 
EUN KATE SUH
ZAHRA JIVANI FENELON
Assistant United States Attorneys